

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

CIVIL ACTION NO: 05-CV-40072 FDS

LANDWORKS CREATIONS, LLC)
)
Plaintiff)
)
v.)
)
UNITED STATES FIDELITY AND)
GUARANTY COMPANY and)
LOVETT-SILVERMAN CONSTRUCTION)
CONSULTANTS, INC.)
)
Defendants)

ASSENTED TO MOTION TO EXTEND TIME TO RESPOND TO DEFENDANT, USF & G'S
MOTION FOR A PROTECTIVE ORDER UNTIL JULY 20, 2007

Now comes the Plaintiff, Landworks Creations, LLC., and moves for an extension until July 20, 2007 to respond to the Motion for a Protective Order filed by Defendant USF & G ("the Moving Party"). As grounds for this motion, the Plaintiff notes that its counsel has been on trial in Middlesex Superior Court during the first week of the response period, and the parties are now attempting to resolve this discovery dispute without further involvement with the Court. It is expected that a resolution will either be reached or, in the alternative, that the extension of July 20, 2007 will provide sufficient time for the Plaintiff to respond to the moving papers.

Respectfully Submitted,

Landworks Creations, LLC

By its attorney,

s/Robert N. Meltzer
The Mountain States Law Group
Robert N. Meltzer, BBO #564745
P.O. Box 1459
Framingham, MA 01701
Phone: (508) 872-7116

Assented to:

For the Moving Party,

United States Fidelity & Guaranty Co.

s/Eric Hipp
Eric Hipp, BBO #642658
Hermes, Netburn, O'Connor & Spearing
265 Franklin Street, Seventh Floor
Boston, MA 02109
Phone: (617) 728-0050

CERTIFICATE OF SERVICE

I, Robert N. Meltzer, do hereby certify that on this 10th of July, 2007 I served a copy of the foregoing on the following counsel of record by first class mail, postage prepaid:

Hermes, Netburn, O'Connor & Spearing
265 Franklin Street, Seventh Floor
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Attn: Eric Hipp, Esq.

Donovan Hatem
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Attn: Julie Ciollo, Esq.

Robert N. Meltzer